

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET  
**FOR THE PERIOD FROM MARCH 8, 2022 THROUGH MARCH 31, 2022**

Debtor: LTL Management LLC Applicant: Walsh Pizzi O'Reilly Falanga LLP  
Case No.: 21-30589-MBK Client: Randi S. Ellis, LRFTC  
Chapter: 11 Case Filed: October 14, 2021 (the "Petition Date")

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SECTION I  
FEE SUMMARY

☒ Monthly Fee Application No. 1 ☐ Final Fee Application

Summary of Amounts Requested for the Period from March 8, 2022 through March 31, 2022  
(the "First Statement Period").

Total Fees:	\$72,732.50
Total Disbursements:	\$1,083.38
Total Fees Plus Disbursements:	\$73,815.88
Minus 20% Holdback of Fees:	\$14,546.50
<b>Amount Sought at this Time:</b>	<b>\$59,269.38</b>

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fee Requested:	<u>\$0</u>	<u>\$0</u>
Total Fees Allowed To Date:	<u>\$0</u>	<u>\$0</u>
Total Retainer (If Applicable)	<u>\$0</u>	<u>\$0</u>
Total Holdback (If Applicable)	<u>\$0</u>	<u>\$0</u>

<b>NAME OF PROFESSIONAL &amp; TITLE</b>	<b>YEAR ADMITTED (Or Years Of Professional Service)</b>	<b>HOURS</b>	<b>RATE</b>	<b>FEE</b>
Hon. Mark Falk (Ret.), Counsel	1977	38.6 (includes 5.2 hours of travel time billed at 50%)	\$900.00	\$32,400.00
Liza M. Walsh, Partner	1985	19.4 (includes 3.3 hours of travel time billed at 50%)	\$850.00	\$15,087.50
Stephen V. Falanga, Partner	1992	21.5 (includes 3.8 hours of travel time billed at 50%)	\$650.00	\$12,740.00
Christine I. Gannon, Partner	2004	14.4	\$490.00	\$7,056.00
Jessica K. Formichella, Associate	2017	7.8	\$355.00	\$2,769.00
Barbara E. Troyan, Paralegal	N/A	12	\$200.00	\$2,400.00
Gemma Pineiro, Paralegal	N/A	1.4	\$200.00	\$280.00
		<b>115.1</b>		<b>\$72,732.50</b>

**SECTION II  
SUMMARY OF SERVICES**

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEE</b>
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) <b>Asset Disposition</b> Sales, leases, abandonment and related transaction work.		
c) <b>Avoidance Action Litigation</b> Preference and fraudulent transfer litigation.		
d) <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) <b>Case Administration</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	58.4	\$35,602.00
f) <b>Claims Administration and Objections</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) <b>Employee Benefits/Pensions</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.		
h) <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	15.7	\$8,153.00
i) <b>Fee/Employment Objections</b> Review of an objections to the employment and fee applications of others.		

SERVICES RENDERED	HOURS	FEE
j) <b>Financing</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) <b>Litigation</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	28.7	\$23,640.00
l) <b>Meetings of Creditors</b> Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.		
m) <b>Plan and Disclosure Statement</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.		
n) <b>Relief from Stay Proceedings</b> Matters relating to termination or continuation of automatic stay under 362.		
o) <b>Accounting/Auditing</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) <b>Business Analysis</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		
q) <b>Corporate Finance</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		

SERVICES RENDERED	HOURS	FEE
r) <b>Data Analysis</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) <b>Litigation Consulting</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.		
t) <b>Reconstruction Accounting</b> Reconstructing books and records from past transactions and brining accounting current.		
u) <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.		
v) <b>Valuation</b> Appraise or review appraisals of assets.		
w) <b>Travel Time</b> Please note that non-working travel time must be billed at 50% of cost.	12.3	\$4,977.50
<b>SERVICE TOTALS:</b>	<b>115.1</b>	<b>\$72,732.50</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
a) <b>Filing Fees</b> Payable to Clerk of Court.	
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and a description of manner calculated.	
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print.	
d) <b>Fax</b> Include per page fee charged.	
e) <b>Case Specific Telephone/Conference Call Charges</b> Exclusive of overhead charges.	
f) <b>In-house Reproduction Services</b> Exclusive of overhead charges.	
g) <b>Outside Reproduction Services</b> Including scanning services.	
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurant.	
i) <b>Court Reporting</b> Transcripts.	
j) <b>Travel</b> Mileage, tolls, airfare, parking.	\$694.77
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery.	
l) <b>Postage</b>	
m) <b>Other (specify)</b> Meals	\$388.61
<b>DISBURSEMENTS TOTALS:</b>	<b>\$1,083.38</b>

I certify under penalty of perjury that the foregoing is true correct.

Executed on April 29, 2022

*s/Mark Falk*

Mark Falk